# CITY OF HARTFORD CONNECTICUT

# Analysis of Impediments to Fair Housing Choice Report



July 1, 2005 - June 30, 2010

This report was prepared by the Department of Development Services, Division of Grants Management and coordination with the Housing Education Resource Center, in accordance with the Consolidated Planning Regulation; 24 CRF Part 91.

# CITY OF HARTFORD ANALYSIS OF IMPEDMENTS TO FAIR HOUSING FIVE YEAR PLAN JULY 1, 2005-JUNE 30, 2009

This Five Year Housing Impediment Plan is a review of the City of Hartford's laws, regulations, programs, policies and practices affecting the location, availability and accessibility of housing as well as an assessment of conditions, both public and private, affecting fair housing choice.

The City of Hartford is committed to affirmatively furthering fair housing choice for all of its residents. This will be accomplished by:

- 1. Conducting an analysis of impediments to fair housing within its jurisdiction;
- 2. Identifying policies, programs and practices that address the identified impediments;
- 3. Developing recommendations to overcome the effects of impediments identified;
- 4. Maintaining records of corrective actions taken to improve or remove the impediments identified.

This analysis will also, where applicable, provide an update of the progress that has been made in addressing impediments identified in the previous five-year report submitted to the U.S. Department of Housing and Urban Development. Except where noted, 2000 census data is used.

#### METHODOLOGY/PROCESS

The Hartford Department of Development Services, Division of Grants Management is required to include a Five Year Housing Impediment Plan as part of its Five Year Consolidated Plan. Primarily due to staff reductions and changes within the Department, it was decided to contract with the Housing Education Resource Center to develop the plan.

The Housing Education Resource Center (HERC) is a non-profit organization located in Hartford that provides various housing assistance services to residents of the 29-town Capitol Region. Established in 1980, HERC has extensive experience in identifying fair housing impediments and addressing them through its programs, services and activities. HERC is the only organization in the area that provides housing mobility services and is currently operating its fourth mobility program since 1992. The organization also provides counseling to renters, landlords and prospective home buyers that focuses on housing rights and responsibilities, particularly in the area of fair housing.

In past years, HERC has provided the City of Hartford with assistance in developing Annual Updates to the Analysis of Impediments to Fair Housing Choice Reports submitted to HUD annually. The organization's experience, expertise and knowledge regarding fair housing issues assisted in developing this report.

The following steps were taken to develop this report:

• "Analysis of Impediments to Fair Housing Choice" Reports dated May, 1997 and September, 2003 and the FY2003-2004 Update were examined and analyzed

- Extensive research was conducted using various resources including the internet, newspaper articles, press releases, promotional material, City reports and other documents
- City departments and public and private agencies were contacted for information and input
- The draft was amended as necessary to incorporate relevant comments
- A second draft was submitted to the Department of Development Services, Division of Grants Management for review, comments and suggestions were incorporated as needed
- The final draft was submitted to the Hartford City Council for review and comment
- The report was completed

Representatives of the following agencies and organizations provided information and input used in the development of this report:

- City of Hartford Department of Development Services; Division of Grants Management, Division of Housing and Property Management and Division of Planning
- City of Hartford Office of Human Relations (Fair Housing Officer)
- Hartford Housing Authority
- Imagineers, LLC
- City of Bridgeport Fair Housing Office
- Connecticut Commission on Human Rights and Opportunities Fair Housing Unit
- Co-opportunity, Inc.
- Fannie Mae Hartford Partnership Office
- U.S. Department of Housing and Urban Development
- Capitol Region Council of Governments

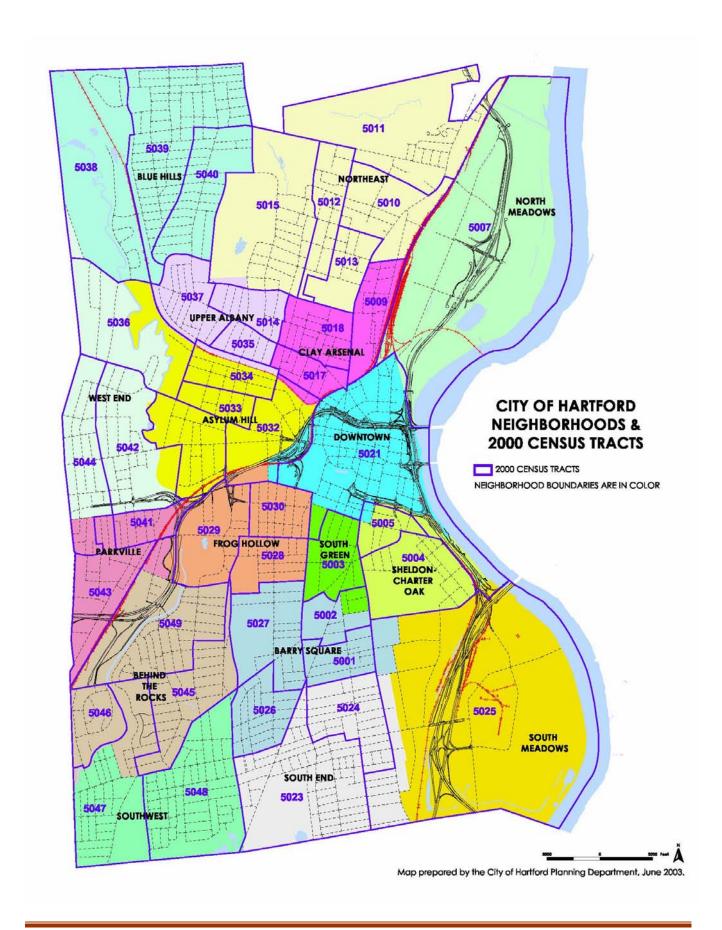
#### **GENERAL INFORMATION**

The city of Hartford is a small city in geographic area and in population. It is 18 square miles and, according to the 2000 Census has a population of 121,578. The Census undercounted 2,545 University of Hartford residents in the Blue Hills neighborhood, Census Track 5038, Block 2000. Although the Census data does not reflect this, it is worth noting the accurate Hartford population is 124,123. The population is 47.8% male and 52.2% female. It is a young city, with a median age of 28.3. The population is very diverse, with 40.5% Hispanic/Latino, 36% Black/African American, 17.8% white, 1.6% Asian and 4.1% "other". According to the Bilingual/Bicultural Department of the Hartford Public Schools, students in the Hartford Public Schools speak approximately 46 languages. While this is a positive attribute, 7,163, or 16%, of Hartford households are linguistically isolated. That is, all members of the household 14 years and older have at least some difficulty with English.

Education levels are low in Hartford. 39.2% of residents 25 years and older do not have a high school degree or GED, compared to 16% in Connecticut as a whole. Only 12.4% of Hartford's population has a bachelor's degree as compared to 31.4% in Connecticut. Hartford has a high school graduation rate of 56.9%. Not surprising, literacy levels are also very low in Hartford. 73% of city adults, or approximately 71,000 adults, read at or below a 6<sup>th</sup> grade level. Hartford residents do however; speak a number of languages, which makes its neighborhoods very diverse.

Income levels are very low in Hartford. Median family income is \$27,051, mean family income is \$37,978, and per capita income is \$13,428. The percentage of individuals living below the poverty level is 30.6%, which equates to 7,748 families.

Hartford contains 15-17 residential neighborhoods (depending on how they are defined) and two industrial areas (the North and South Meadows). For purposes of this section, we have utilized data compiled by the Citizens Research Education Network (CREN) from the 2000 Census and presented in 17 residential neighborhoods. Although median family income (MFI), vary across neighborhoods, even the highest (Downtown's \$50,500 MFI) are well below the Hartford Eligible Metropolitan Statistical Area (EMSA) MFI of \$75,350.



### CITY OF HARTFORD NEIGHBORHOOD STATISTICS

HARTFORD SOUTH	Hartford	Behind the Rocks	Maple Ave (Barry Square)	South End	Southwest
Population	121,578	9,260	9,542	9,964	6,408
Median age	28.3	29.7	30.0	33.7	42.1
Median family income	\$27,051	\$32,093	\$31,691	\$33,594	\$42,587
Median HH income	\$24,820	\$30,572	\$28,380	\$31,350	\$38,902
RACIAL PROFILE PERCENTAGE					
Hispanic/Latino	40.5	63.3	54.9	44.6	36.7
Black/African American	36.0	17.9	14.0	12.6	13.2
White	17.8	13.3	25.4	35.5	44.2
Asian	1.6	1.8	0.9	1.1	2.5
Other	4.1	3.8	4.9	6.3	3.5
Average # persons per HH	2.58	3.04	2.76	2.61	2.58
Linguistically isolated HH	15.9	19.7	22.6	17.8	11.0
Individuals below poverty level	30.6	25.0	28.2	19.5	6.7
No vehicle in household	36.1	24.6	28.8	24.9	16.9

HARTFORD NORTH	Hartford	Blue Hills	Clay Arsenal	Northeast	<b>Upper Albany</b>
Population	121,578	10,395	6,460	10,137	7,180
Median age	28.3	33.7	24.6	29.4	29.1
Median family income	\$27,051	\$39,090	\$15,716	\$24,853	\$27,936
Median HH income	\$24,820	\$37,115	\$15,343	\$20,133	\$23,000
RACIAL PROFILE PERCENTAGE					
Hispanic/Latino	40.5	6.4	37.8	16.7	10.1
Black/African American	36.0	87.3	32.7	69.9	82.0
White	17.8	2.8	8.4	1.1	0.7
Asian	1.6	0.2	0	0.2	6.6
Other	4.1	3.4	28.5	12.1	
Average # persons per HH	2.58	2.92	3.01	2.77	2.77
Linguistically isolated HH	15.9	1.8	17.1	4.0	2.1
Individuals below poverty level	30.6	16.4	49.7	37.6	32.5
No vehicle in household	36.1	17.6	55.1	45.3	43.6

**NOTE:** The Census undercounted 2,545 University of Hartford residents in the Blue Hills neighborhood, Census Track 5038, Block 2000. Although the Census data does not reflect this, it is worth noting the accurate Hartford population is 124,123.

HARTFORD EAST	Hartford	CSS/CON	Downtown	SoDo (Downtown South)	South Green
Population	121,578	3,513	4765	1,303	6,159
Median age	28.3	32.3	29.6	33.0	26.7
Median family income	\$27,051	19,505	61,026	32,798	21,370
Median HH income	\$24,820	\$16,329	\$50,500	\$34,672	\$22,675
RACIAL PROFILE PERCENTAGE					
Hispanic/Latino	40.5	52.5	49.5	54.6	67.4
Black/African American	36.0	25.7	19.2	8.9	15.2
White	17.8	17.1	29.5	31.8	10.4
Asian	1.6	1.9	1.7	3.6	1.9
Other	4.1	2.8	0.2	1.2	5.0
Average # persons per HH	2.58	2.18	1.69	1.98	2.88
Linguistically isolated HH	15.9	22.3	11.5	22.5	27.4
Individuals below poverty level	30.6	40.2	25.1	32.1	40.4
No vehicle in household	36.1	58.3	23.1	34.0	45.9

HARTFORD CENTRAL AND WEST	Hartford	Frog Hollow South	North Frog Hollow	Asylum Hill	Parkville	West End
Population	121,578	6,048	7,780	11,208	7,228	7,615
Median age	28.3	25.2	25.9	29.1	29.7	35.7
Median family income	\$27,051	\$23,874	\$18,968	\$22,373	\$26,645	\$46,926
Median HH income	\$24,820	\$22,082	\$17,721	\$20,284	\$23,484	\$28,792
RACIAL PROFILE PERCENTAGE						
Hispanic/Latino	40.5	46.4	72.1	28.8	57.8	22.8
Black/African American	36.0	12.8	12.3	51.4	14.3	26.7
White	17.8	33.0	11.4	13.3	18.7	43.5
Asian	1.6	2.7	1.5	1.7	4.5	3.0
Other	4.1	5.1	2.7	4.9	4.6	4.0
Average # persons per HH	2.58	2.74	2.74	1.97	2.66	1.95
Linguistically isolated HH	15.9	33.2	26.9	11.8	27.5	14.6
Individuals below poverty level	30.6	35.6	45.8	37.1	30.9	25.9
No vehicle in household	36.1	44.7	45.4	44.6	33.1	33.5

#### Income

Income data for Hartford show significant differences between the City and the surrounding 29 towns in the Capitol Region:

- \* While the median income for the Capital Region was \$53,305, the median income for the city of Hartford was \$24,820
- \* Hartford's median income was 47% of the Capital Region's median income.
- \* Seven of the 29 towns in the region had median household incomes that were three times higher than Hartford's.
- \* While the percentage of those living in poverty was **9%** for the Capitol Region, it was **30.6%** for the city (according to an article in the <u>Los Angeles Times</u> on June 15, 2003, the only city in the country with a higher poverty rate was Brownsville, Texas). The poverty rate of families with a female head of household was **40.8%**.
- \* 57% of those living in the Capitol Region with incomes below the poverty level lived in the City of Hartford

#### **Education and Employment**

Education and employment data comparing Hartford with the rest of the Region help explain the differences in income:

- Among those 25 years old and older, **39%** of Hartford's residents had not received a high school diploma compared to **16%** of the region's residents who have completed high school.
- The percentage of Hartford residents who have completed high school was comparable to that of the region -30% and 27% respectively, the difference between the percentage of those with

a Bachelor's Degree or higher was great – only 12% of Hartford residents had attained this level of education compared with 32% of the Region's residents.

- Although 44% of Hartford residents who were employed worked in the City, this was 14% less than the percentage of those who lived and worked in Hartford in 1990.
- While **41%** of the residents of the Region had "Management, Professional and Related Occupations", only **21%** of City residents had such jobs.
- The majority of employed Hartford residents (54%) had jobs in Service or Sales and Office Occupations

The correlation between education and employment and income, while not necessarily a fair housing matter, does affect housing choice. Hartford's Mayor Eddie Perez has instituted an education initiative to increase the number of Hartford students graduating from a 4-year college by 25%. At this point, only 10% of Hartford students attend a 4-year college full-time. In his press release announcing a second annual "Early College Awareness Day" the mayor noted that ".about half of the jobs in Hartford today require at least a bachelor's degree. That number will only grow in the future, and Hartford students can not and will not be left out." The press release went on to note that studies have shown that there is "a \$1million difference in lifetime earning potential between having a Bachelor's degree and only having a high school diploma."

The City has been able to help ensure that Hartford residents benefit from the jobs that will be created though economic development efforts relative to Adriaen's Landing. The use of the Section 108 Loan Guarantee Program as well as Brownfields Economic Development Initiative funds will result in at least 219 jobs for low and moderate-income Hartford residents for two projects. The Hartford Marriott, which opened in August 2005, was funded with \$8 million in Section 108 funds and the Front Street Project will take advantage of \$5 million in Section 108 funds with an attached \$2 million Brownsfield Eonomic Development Initiative (BEDI) grant.

The City's most recent Plan of Development was adopted in 1996. Land use allocations may be somewhat different now than they were at that time. The next ten year Plan will be completed in 2006.

From 1947 until January 2004, Hartford operated under a Council-Manager form of government. A fundamental change occurred as the result of voters approving City Charter amendments and revisions that included switching to a "strong mayor" form of government. The Mayor is now the chief executive officer of the city and is authorized to appoint the Chief Operating Officer (formerly City Manager), as well department heads and various members of boards, commissions, agencies and other bodies of the City created by the Connecticut General Statutes or by City Ordinance.

The legislative power and authority of the City is vested in a nine-member City Council. Council members serve four-year terms and are elected at-large. The presiding officer of the Council is the Council President who is elected by majority vote of the Council members.

Although the previous Analysis of Impediments to Fair Housing Choice report noted that "after experiencing tremendous economic growth, development and prosperity in the 1980's, the Hartford region has experienced an increasing and continued decline over the last six years", there are now many indications that the City is rebounding. Currently, several projects are underway that should

result in renewed economic health of the City and its residents. For example, Adriaen's Landing's Convention Center, Marriott Hotel are complete and open. The development of Front Street and the Science Center will soon be underway. The 36 story business and apartments are presently being developed in place of the business which surrounded the Civic Center and hundreds of new apartments and condominiums are either completely sold out or almost completed sold out, which face various parts of Bushnell Park.

A commitment to Hartford's revitalization was formalized in 1998 by the creation of the Capital City Economic Development Authority (CCEDA) by the Connecticut General Assembly. CCEDA is a quasi-pubic authority responsible for overseeing State-supported economic developments agencies in Hartford. The legislation that created CCEDA also authorized state investments to stimulate the metro Hartford economy. Key to the economic redevelopment of Hartford is the so-called "Six Pillars" that include:

- \* Adriaen's Landing- will include a convention center, 700 room hotel as well as a housing, retail and entertainment district. The convention center and hotel opened in the summer of 2005.
- \* <u>Riverfront Recapture</u> both the riverfront park and pedestrian access to the Connecticut River has expanded to allow for more foot traffic and participation of events along the river.
- \* <u>Trumbull Center</u> will include a 100 unit apartment complex, the restoration of 12 historic buildings, retail shops and a parking garage.
- \* <u>Hartford Civic Center (Town Square)</u> the office/retail portion of the Hartford Civic Center has been demolished, and a 36-story high rise will be built to house apartments, offices, retail space and parking.
- \* <u>Capital Community Technical College</u> the former G. Fox department store building was renovated and is now the new home for this two-year community college.
- \* Morgan Street Garage this 2,290 space parking garage in the downtown area was rebuilt and is now a state-of-the-art facility.

Although these "Six Pillars" are the identified cornerstones of Hartford revitalization, there are many other projects planned, underway or completed, including the expansion and renovation of the Wadsworth Atheneum Museum of Art, the newly opened Job Corp Center and Charter Oak Marketplace mall built on the site of the former Charter Oak Terrace public housing project, the renovation and expansion of the Hartford Public Library, the renovation of the Hartford Hilton Hotel and the Colt Gateway development and restoration project.

#### The Housing

Based on the 2000 Census there were a total of **50,644** housing units in the City of Hartford in 2000, **89%** (44,986) of these units were occupied. The 11% unoccupied housing is boarded-up buildings, residents in transition and the all percentage because lag time between one tenant leaving and another tenant moving in.

- Hartford lost **6,478** occupied housing units between 1990 and 2000. Of these, **1,084** (**17%**) were owner-occupied units and **5,394** (**83%**) were renter-occupied
- Hartford has the second lowest homeownership rate in the country at 25%. The ownership rate for the Capitol Region was 66%
- 63% of the City's housing stock was built prior to 1959
- 81% of Hartford's housing stock is in structures with 2 or more units
- 36% of Hartford's housing stock 33% rental and 3% owner are subsidized
- 47% of all assisted units in the Capitol Region are located in Hartford
- The median value of a home in Hartford in 2000 was \$93,900. The median home value in the Capitol Region was \$151,220.
- The median gross rent in the City was \$560. In suburban communities, it was \$843 and the median for the region was \$676.

#### **IMPEDIMENTS and RECOMMENDATIONS**

Any discussion of housing impediments must make the distinction between impediments to housing choice and <u>fair housing</u> choice. In Connecticut, it is illegal to discriminate against any person on the basis of race, color, ancestry, national origin, religion, familial status, sex, mental or physical disability, age, lawful source or income, marital status or sexual orientation. Legal protections in Connecticut are greater than those afforded by the Federal Fair Housing Act. Both Connecticut laws and the Federal Fair Housing Act apply to the following:

- \*\* Rental, lease or sale of a dwelling or a lot
- \*\* Provision of a mortgage or rehabilitation financing
- \*\* Provision of real estate or brokerage services
- \*\* Advertisement for sale or rental of housing
- \*\* Appraisal of a property
- \*\* Terms and conditions of rental or sale of housing
- \*\* Provision of property or hazard insurance

<u>Impediment</u>: Lack of knowledge by housing consumers of Fair Housing Laws, discriminatory practices and enforcement agencies and procedures. Further, those suspecting discrimination are reluctant to report it or proceed with filing fair housing complaints.

**Education and enforcement** are key to addressing impediments to fair housing. Both housing providers and consumers must be aware of the protections afforded by Fair Housing laws and those who believe they have experienced discrimination must have legal recourse through strong enforcement mechanisms and entities. The City of Hartford as well as organizations and agencies that serve Hartford residents address both education and enforcement. These include:

- Hartford Office of Human Relations (education and referral)
- U.S. Department of Housing and Urban Development (education and enforcement)
- The Connecticut Commission on Human Rights and Opportunities (education and enforcement)
- The Housing Education Resource Center (education, screening and referral)
- The Connecticut Fair Housing Center (education, investigation, litigation)

- Legal Assistance Resource Center of CT (education and representation)
- Statewide Legal Services (education and representation)
- Greater Hartford Legal Aid (education and representation)
- Hartford Areas Rally Together (home ownership)
- Urban League of Greater Hartford (home ownership)
- Co-Opportunity, Inc. (home ownership)

The City of Hartford's Office of Human Relations is the City's primary agency that addresses Fair Housing. Information explaining Connecticut Fair Housing Laws and enforcement is included on its web site. The web site also explains special provisions relating to accommodations for handicapped individuals. Visitors to the web site can obtain HUD's "Fair Housing Equal Opportunity For All" booklet in both English and Spanish as well as "Americans with Disabilities Act Questions and Answers". The site also provides links to The State of Connecticut Commission on Human Rights and Opportunities (CHRO) and the U.S. Department of Housing and Urban Development.

**Recommendation:** The City's Office of Human Relations should expand the Fair Housing section of its web site to include additional links and descriptions of agencies that address fair housing. Contact information should be included with a description of fair housing services available from each. The web site could also highlight fair housing cases and publicize settlements awarded to complainants found to have been discriminated against. Such information could serve to encourage those who believe they have experienced discrimination, to take action. Examples of discriminatory actions and/or policies should also be added.

It is often assumed that providers of housing are knowledgeable of fair housing laws and discriminatory practices. It is further assumed that when a discriminatory act is committed that it is intentional. This is not always the case. The Housing Education Resource Center (HERC) has, for 22 years, been providing counseling and education to both tenants and landlords that help them solve their housing problems and answers their housing questions. These services primarily focus on tenant and landlord rights and responsibilities and fair housing has been a priority issue in all programs the organization operates. It has been the experience of HERC that quite often landlords are not aware that certain practices are illegal. HERC has conducted numerous landlord education programs (including sessions held in partnership with the Hartford Nuisance Abatement Program) in addition to providing one-on-one counseling. Landlords are often surprised to learn that they can not refuse to rent to household because the family has a Section 8 voucher, or because the family is relying on the State Security Deposit Guarantee program for assistance. They do not know that they cannot require families with children to lease a first floor unit or only permit them to rent in a certain section of a building.

In fact, in many cases, HERC has been able to assist households obtain housing that they had been illegally denied simply by informing property owners that their reason for denial was discriminatory.

**Recommendation:** The City, through the Office of Human Relations, should work with the Housing Education Resource Center to conduct educational workshops for city landlords that focus on fair housing and housing discrimination.

**Recommendation:** Those purchasing multi-family homes through programs sponsored and funded by the City should be required to attend a landlord education program before closing on their properties.

<u>Impediment</u>: The City of Hartford does not have a Fair Housing Ordinance, although one is currently being developed by the City's Fair Housing Officer, located in the Office of Human Relations.

**Recommendation:** The City needs to continue to make the development of a Fair Housing Ordinance a priority and the Fair Housing Officer has the resources available to develop it in a timely fashion.

<u>Impediment</u>: The City's Office of Human Relations has only began track the nature of fair housing complaints or requests for information in 2004.

**Recommendation:** The Office of Human Relations should continue develop a uniform system to record the specific inquiries and complaints it receives relative to fair housing. This information should continue to be shared with agencies within the City that address fair housing. This will help both the City and these agencies conduct outreach campaigns that address the issues of most concern to Hartford residents.

<u>Impediment</u>: The City does not have a full-time Fair Housing Officer to address all aspects of fair housing laws, policies and practices.

**Recommendation:** The City should hire a full-time Fair Housing Officer. This would allow on-going representation and active participation in the Fair Housing Association of Connecticut, which is composed of housing advocates, representatives of municipalities, state agencies, real estate interests, lenders and housing service agencies regularly meets to share information on fair housing issues and housing trends.

#### **AFFORTABILITY**

A major impediment to housing choice for Hartford residents is the lack of income. As previously stated, the median household income in Hartford in 2000 was \$24,820 and the <u>per capita</u> income was \$13,428. Clearly, the income of many Hartford residents severely restricts their choice of housing. Many must depend on rental assistance or special mortgage programs to make housing affordable. Additionally, many low-income families and individuals have poor credit histories. Poor credit and insufficient income are both legitimate reasons for landlords to deny rental housing and lenders to deny mortgage financing. However, the availability of affordable housing has a direct impact on the racial and ethnic composition of an area. Because Hartford's housing is the most affordable in the region, the City has become the home for the majority of the region's low-income and minority residents.

#### **RENTAL HOUSING**

#### **Subsidized Housing**

Clearly, there is a great need in Hartford for subsidized housing for its residents. Traditionally, public housing projects have been the home for many for low-income individuals and families. Beginning in 1996 with the demolition of the 1,000-unit public housing project, Charter Oak Terrace, and most recently the scheduled demolition of the 186-unit Dutch Point Colony, public housing in Hartford has dramatically changed. Four major housing projects, consisting of over 2,000 units have been either demolished or renovated to create developments with substantially less densities than before and which offer home ownership opportunities. Because the inventory of public housing units has diminished, the Hartford Housing Authority (HHA) used Section 8 for the relocation of many of the residents of

these projects. Since 1996, the number of Section 8 vouchers administered by HHA has increased from 350 to 2,018.

This "Reinvention of Public Housing" in Hartford has therefore resulted in an increased reliance on the Section 8 Housing Voucher Program to assist low-income households obtain affordable housing. The City of Hartford contracts with Imagineers, LLC to administer its Section 8 program. There are fair housing issues relative to the use of Section 8 vouchers that require attention. These include:

- **Housing Mobility** and mobility support services to ensure families are aware of their ability to use their vouchers wherever they chose and have assistance with exploring their housing opportunities in low-poverty areas
- Recent and proposed **HUD policies** regarding the administration and funding of the Section 8 program threaten to limit fair housing opportunities for program participants
- Fair Housing Laws that prohibit discrimination based on lawful source of income

As the statistical information presented above shows, the median rent of \$560 in Hartford is well below the median rent, \$676, for the region. However, the median rents in many Capitol Region communities are well above that of the region. Further, the percentage of minority population and the poverty rates of these municipalities are well below that of the region, and substantially below Hartford's. A few examples are based on the Census 2000:

Town	Median Rent	Minority Population Povert		
Hartford	\$560	80.8%	30.61%	
Manchester	\$754	19.9%	7.97%	
West Hartford	\$751	17.2%	4.53%	
Glastonbury	\$775	8.3%	2.09%	
Rocky Hill	\$851	11.7%	2.90%	
Farmington	\$860	8.5%	4.51%	
South Windsor	\$844	9.9%	1.80%	
Capitol Region	\$676	27.5%	9.00%	

Although the minority population increased in all of these communities between 1990 and 2000, there is still great disparity between the minority composition of Hartford's population and that of the other towns in the Region.

The use of Section 8 should allow participants to obtain housing in areas with low minority and low-poverty concentrations. Housing mobility programs, operated by the Housing Education Resource Center provided greatly needed assistance to Hartford households interested in exploring their housing options in suburban communities. Although the Housing Education Resource Center (HERC) is now operating its fourth mobility program since 1992, only those who receive their vouchers through the State Department of Social Services are eligible to receive services.

Housing mobility programs operated by HERC in the past for those who received vouchers through the Hartford Housing Authority (Regional Opportunity Counseling Program and Charter Oak Mobility Program) and Imagineers, LLC (Hartford Section 8 Mobility Support Services Program) provided families with a range of services. In addition to helping families explore housing opportunities in low-

income neighborhoods, mobility counselors also helped ensure that they were not discriminated against. In some instances, landlords were not aware that families could not be denied housing because they participated in a rent subsidy program. And in many instances, Section 8 households were not aware of this either.

Mobility counselors also played an important role in expanding housing opportunities by negotiating rent and security deposit amounts on behalf of clients with landlords and Section 8 administrators. Often, even with exception rent allowances, Fair Market Rents were below what was charged by suburban landlords. Security deposit amounts were also frequently above what was affordable to families. Mobility counselors were able to persuade landlords to accept lower rent and security amounts while securing higher rent payments from program administrators who would make these concessions on a case-by-case basis.

Although Section 8 counselors at Imagineers and at the Hartford Housing Authority inform clients of their mobility options, often households lack the knowledge and wherewithal to seek the best housing available for their household. Mobility support services provide the extra assistance that many families need to fully explore their options and to find solutions to other barriers that affect relocation.

<u>Impediment</u>: The lack of Housing Mobility Support and Assistance services for participants of Hartford-based Section 8 Programs operated by the Hartford Housing Authority and Imagineers impede the ability of these households to fully explore their housing options and opportunities.

**Recommendation:** Support expansion of current mobility support and assistance services by endorsing increased program funding.

At this point, perhaps the biggest threat to housing mobility and fair housing choice relative to the Section 8 program are changes made by HUD in the way the program is funded. Rather than pay PHAs for the actual cost of vouchers in use, as of 2004, the budget for each administering PHA is limited to a set amount each year. The funding for the current year was based on average monthly costs from May to July, 2004. PHAs cannot receive any additional funding in the event the costs for individual vouchers increase. Clearly, PHAs now must focus on saving money rather than housing families. As PHAs try to deal with this change in funding, some have already determined that they will not pay any rent increases. And, although PHAs have had the flexibility to approve rents from 90% to 110% of the area median, it is highly unlikely that many will be authorized at the higher end of the range. As a result, there will be fewer moves to areas with higher rents and lower poverty rates and lower minority concentrations. Although in some cases, part of the increased cost burden can be shifted to the tenant, there are limits both within the program and in reality as to how much additional rent tenants can pay for themselves.

While the change in program budgeting is relatively new and **all** of its effects will not be known for some time, it is important that the situation be monitored. It is possible that many of those who have made mobility moves will not be able to continue their tenancies in higher cost areas and will have to seek housing in lower cost areas, most likely the City of Hartford. And, those who would like to relocate out of the City will be unable to do so. This is a major fair housing issue and can result in a disproportionate number of minority residents in Hartford at the poverty level or lower.

<u>Impediment</u>: Changes made by HUD in the funding and administrative policies of the Section 8 program will result in reduced mobility and fair housing choice for program participants that can lead to increased poverty and minority concentration in the City of Hartford.

**Recommendation:** The City must closely monitor the effects of changes made to the administration and funding of Section 8 and provide support for measures taken by Imagineers and the Hartford Housing Authority to ensure mobility remains an integral component of City Section 8 Programs. City officials should make sure members of Connecticut's Congressional delegation are aware of the adverse impact changes and cuts to the Section 8 program have/will have on equal housing opportunities.

<u>Impediment</u>: Households participating in Section 8 and other subsidy programs may not be fully aware that they are protected against discrimination based on their participation in these programs.

Connecticut Fair Housing Laws prohibit discrimination against households based on their lawful source of income. Because of this protection, landlords may not refuse to rent to households because they participate in Section 8 or receive other housing assistance (RAP, T-RAP). Protections extend to the use of the State Security Deposit Guarantee.

According to the Connecticut Commission on Human Rights and Opportunities, which is the State's Fair Housing enforcement agency, the highest number of housing complaints received in Hartford during 2003-2004, were for discrimination based on lawful source of income. It was estimated that around 90% of these complaints were related to Section 8 housing.

**Recommendation:** Ensure that Imagineers and the Hartford Housing Authority continue to inform subsidy recipients of fair housing laws, discriminatory practices and enforcement procedures. Families using this assistance must be aware of their rights under the Fair Housing Laws as well as the various ways in which they may be discriminated against (i.e. all subsidized families being offered units in only one section of a complex). Households should take advantage of outside agencies and Section 8 administrators, which provide education and information to subsidy holders about their fair housing rights.

<u>Impediment</u>: There is no system for Section 8 administrators to obtain and share information about landlords who are found guilty of housing discrimination.

**Recommendation:** The City's Fair Housing Officer should convene representatives of City Section 8 administrators, CHRO, HUD and other groups that address fair housing to develop such an information sharing system and Section 8 administrators, with HUD, should determine what their course of action will be regarding the participation of these landlords in their Section 8 programs.

#### UNSUBSIDIZED HOUSING

Most of the <u>new</u> rental housing development occurring in Hartford is of market rate and luxury units. In the downtown area alone, the number of units will almost triple from 753 in 2000 to almost 2,000 units to be constructed during the next 2-5 years. While there is much enthusiasm for efforts that encourage higher income households to reside in the City, and there is no question that the City will benefit from this type of housing, care must be taken that the housing market does not shift to the point where lower income families cannot afford to find or maintain housing.

**Recommendation:** Developers should consider setting aside a portion of low-moderate income units.

#### OWNERSHIP HOUSING

As previously noted, only 25% of Hartford's residents own their own home. The City is in the middle of a concentrated effort to increase this rate to 30% over the next few years. This effort is being supported through Mayor Eddie Perez' Homeownership Task Force and the Neighborhoods of Hartford, Inc. (NHI). NHI is a non-profit organization, was created to implement the Task Force's recommendations. This organization is charged with managing the distribution of grants and loans to targeted Rising Star and Pride Block neighborhoods.

Increasing the home ownership rate in Hartford will necessitate encouraging households to purchase multi-family units since only 14.9% of the housing stock in the city are single family detached units. Also, there is very little vacant land available for residential development.

The reinvention of public housing, discussed earlier, has resulted in an increased supply of owner-occupied single family and duplex homes. After projects such as Rice Heights, Charter Oak Terrace and Stowe Village were raised, new ownership units were constructed in their place. The same is now occurring with Dutch Point, which will include a mix of rental and ownership housing.

While a goal in all of these developments is to provide ownership opportunities to those who formerly occupied the public housing units, in many instances these families do not have enough income to afford the market purchase price. However, through the use of various financing mechanisms, home ownership has become possible.

Key programs operated by the City are:

- **HouseHartford** in partnership with Fannie Mae and local lenders, offers homebuyers down payment and closing cost assistance as well as mortgages for those purchasing one to four family homes in Hartford. The program targets low income borrowers with income restrictions. Even so, there is considerable flexibility for those purchasing two to four family properties. There are also limits on the amount of rent that can be charged for units in multi-family buildings purchased through the program, thereby helping ensure that they too are affordable to lower income households. According to the Department of Development Services, Housing and Property Management Division, **785** households have purchased homes through this program since 1996. These purchases involved **1,240** units.
  - **Homeownership Appraisal Gap Financing** in partnership with the Community Development Block Grant (CDBG) support, provide assistance to housing developers so that units either rehabilitated or constructed are affordable to low-income households. Since 1999 this program has been used to make **541** units in **383** structures affordable.

In addition to CDBG assistance several area lenders and businesses have also made financial contributions to the Mayor's Homeownership Initiative including, Webster Bank, Washington Mutual, Phoenix, Aetna, CIGNA and Travelers Property Casualty Corporation.

Pre-purchase counseling is of critical importance to first-time homebuyers. Such counseling educates households about the responsibilities of homeownership and prepares them for the home buying process. This counseling should include components addressing fair housing and predatory lending.

The City has recognized the importance of pre-purchase counseling and has provided CDBG funding to enable Co-Opportunity, Inc., Hartford Areas Rally Together (HART) and the Urban League of Greater Hartford to provide it to families purchasing homes in conjunction with the Homeownership Initiative. The Connecticut Housing Finance Authority (CHFA), which is a major source of mortgage financing and down payment assistance for those purchasing in the city, requires families to participate in Homeownership education classes prior to receiving a mortgage through its first time buyer program.

<u>Impediment</u>: Limited homeownership opportunities have impacted the ability of low-income minority households to benefit from the financial advantages and stability that it affords.

**Recommendation:** The City should continue to provide CDBG funds to help ensure the goals of the Mayor's Homeownership Initiative are achieved. Further, it should continue to seek additional funds from area lenders and corporations to assist in this effort.

<u>Impediment</u>: Many first-time homebuyers have little or no knowledge of fair housing laws and/or illegal discriminatory practices and/or predatory lending, as most of these homebuyers are minorities with poor credit.

**Recommendation:** The City should continue to support homeownership counseling and require that those purchasing through its Homeownership Initiative programs complete it one of the counseling programs prior to closing. The City should continue to require housing counselors to provide information regarding fair housing and predatory lending.

#### HOUSING STOCK

Previous "Analysis of Impediments to Fair Housing Reports" noted that the housing stock in Hartford created barriers to fair housing for the following reasons:

- There is insufficient family style housing stock
- Much of the housing is old and structures with historical designation are costly to rehabilitate due to standards that must be followed for such buildings
- Many of the older properties have lead paint and are therefore unfit for families with children under the age of six
- Vacant and abandoned properties that cannot be rehabilitated take up valuable space where habitable housing can be built

The City has several programs that address most of these issues:

• The **HOME Investment Partnerships Program** provides funding for the purchase and/or rehabilitation of residential properties for the purpose of creating housing units affordable to low income households. Priority is given to projects that include a homeownership component and that

- reduce existing density. The program requires that assisted rental housing remain affordable for a fixed period of from five to twenty years. Since 1992, **1,264** units have been rehabilitated or created through this program.
- The **Housing Preservation Loan Fund Program** provides low interest loans of up to \$30,000 that are designed to encourage property owners of 1-4 unit buildings to fix their properties with the goal of increasing the supply of decent housing for low- and moderate-income people. The program targets buildings that house low-income families or will be leased to such families following completion of the improvements. Since 1992, **505** property owners have received assistance through this program and **1,080** units have been improved.
- The **Lead Hazard Control Program** provides training and education to residents about the dangers of lead poisoning as well as loans to Hartford property owners for lead paint abatement and related rehabilitation. Since 1997, this program has produced over 333 lead safe housing units in Hartford and has provided awareness training to over 550 residents with children.
- The **Office of Property Acquisition and Disposition** works to improve and strengthen neighborhoods by eliminating housing blight, lowering density and stabilizing the existing housing stock. As of June 2004, the most updated information available, this office has:
  - \*\* Foreclosed on approximately 650 blighted and tax delinquent properties
  - \*\* Taken possession of approximately 400 properties
  - \*\* Sold 350 properties
  - \*\* Sold 700 tax liens
  - \*\* Abated and mothballed approximately 500 properties

The City continues to operate all of these programs which have had a positive effect on improving and increasing housing opportunities for low- and moderate-income residents.

#### **DISABILITY ISSUES**

Under Connecticut and Federal Fair Housing Laws, it is illegal to discriminate based on physical or mental disability. Reasonable accommodations must be made to meet the needs of handicapped individuals. Housing providers must maintain flexibility in their enforcement of rules, policies and practices and in the provision of services so that handicapped individuals may have an equal opportunity to use and enjoy their housing. Also, based on a City of Hartford Ordinance a Commission on Disabilities was created to addresses these issues and makes recommendations to the Mayor regarding disability issues.

In the case of physical disabilities that affect mobility, property owners must allow tenants to make reasonable modifications to living units and/or common areas to allow access and use. It is usually the tenant's responsibility to make these physical modifications and to restore the property to its original condition when occupancy ends.

There is a wide range of issues and concerns relative to equal opportunity and access for those with disabilities. Making accommodations for disabled individuals can range from installing a visual smoke alarm to installing ramps, grab bars, widening doorways and lowering counters. The two most prevalent statewide complaints submitted to the Commission on Human Rights and Opportunities in 2003-04, alleged "failure to accommodate" and issues involving parking and service animals.

<u>Impediment</u>: Disabled individuals and housing providers need to be aware of their rights and responsibilities under Fair Housing Laws and the Americans with Disabilities Act (ADA).

**Recommendation:** The City's Office of Human Relations web site includes a brief explanation of this issue and a link to "ADA Questions and Answers". However, the inclusion of specific examples of accommodations would make the subject easier to understand. Outreach material and information should be developed by the Commission on Disabilities Issues and the City's Fair Housing Officer addressing this aspect of fair housing.

#### LENDING POLICIES AND PRACTICES

Under City ordinance, lenders who are depositories of city funds are required to provide loan data on an annual basis. This information can be used to determine if mortgage, and other housing related loans (refinance, rehabilitation, home equity) are being made on an equitable basis city-wide. The City Office of Human Relations (OHR) has loan data reporting forms that are used for the submission of this information. On OHR Loan Data Reporting Form lenders report the number of loan applications received by census tract, the number approved, the number denied, the average effective interest rate of the loan(s), and other terms. Examination of this data can clearly show if loans for properties in certain neighborhoods are being denied more frequently than those in other neighborhoods and if purchasers are receiving less favorable terms.

Unfortunately, in recent years the Office of Human Relations has not had adequate staff to enforce this reporting requirement. The most recent loan information on file with the City was for 2004. When the seven lenders who are city depositories were requested to provide this information for this report, only four complied and of the four, only two submitted the information on the OHR form. The reporting of data on the City's form is necessary because lender-generated reports do not provide all of the information required by the city, are difficult to compare with one another and in one instance, could not be accessed by either the City's Fair Housing Officer or the author of this report due to software incompatibility.

<u>Impediment</u>: The lack of loan reporting data from lenders makes it impossible to determine if housing loans are being made in a non-discriminatory manner geographically throughout the city and with equitable terms.

**Recommendation:** The City must enforce the loan data reporting requirement and have staff assigned to examine and analyze the data when it is submitted.

<u>Impediment</u>: Lenders do not submit loan data information on a regular basis and some do not comply with City requests for it or do not provide it in the required format.

**Recommendation:** The OHR Fair Housing Officer has indicated he plans to meet with lender representatives to review City reporting requirements. Lenders need to be reminded that noncompliance can result in the City revoking depository qualifications. A deadline should be set for the submission of annual data

<u>Impediment</u>: Although the loan data reporting forms require lenders to report on the number of loan applications received, approved and denied, they do not request than lenders report the reason loans were denied.

**Recommendation:** The loan data reporting forms should be revised to include a section for lenders to report why loans were denied.

<u>Impediment</u>: The City can only require the submission of loan reporting data from those lenders that are depositories of City funds. These lenders represent just a portion of those providing housing loans to City residents.

**Recommendation:** The City Fair Housing Officer should meet with additional lenders and request that they provide loan data information on a voluntary basis.

#### **Impediment**

Community Reinvestment Act (CRA) reports provide lending information and indicate how depository institutions are meeting the credit needs of the communities in which they operate. Although these reports can be used to evaluate a lender's performance in assisting low and moderate income neighborhoods, they are not specific to housing. CRA reports are public information and can be obtained either directly through lenders or via the Internet.

**Recommendation:** The City's Fair Housing Officer should periodically review and evaluate the CRA reports of City-based lenders to ensure they are meeting the housing credit needs of City residents.

It should be noted that several lending institutions participate in the HouseHartford Program. These currently include: Bank of America Corporation, Chase Manhattan Mortgage, Citizen's Mortgage, Countrywide Home Loans, First World Mortgage, GMAC Mortgage Corporation, Irwin Mortgage Corporation, McCue Mortgage, New York Mortgage Company, People's Bank, Prospect Financial Services, Webster Bank and Wells Fargo Home Mortgage.

#### **REGIONAL APPROACHES**

As the census data presented earlier in this report shows, there are many differences between Hartford and other communities in the Region. Many of the problems and concerns of the City must be addressed by the Region. This is especially true regarding housing and housing choice.

The Capitol Region Council of Governments (CRCOG) is the primary agency bringing together the towns of the region to address issues and challenges facing the region. For over 30 years, CRCOG has provided the forum for public officials and community leaders to share common concerns, and develop regional strategies and solutions.

The CRCOG Housing Committee, through the agency's Community Development Department has taken several actions over the years to promote fair housing and equal opportunity throughout the Capitol Region. The housing goals of CRCOG's current "Plan of Conservation and Development for the Capitol Region" are those that should be shared and embraced by the City of Hartford:

- Increase the Range of Choice in Housing for People of All Incomes and All Ages, but Especially for Those Who Have the Least Choice in Achieving Their Locational Preference
- Enforce Federal and State Fair Housing Laws
- Encourage and Support the Maintenance and Revitalization of Viable Residential Neighborhoods
- Support Preservation of the Region's Rental Housing Stock, and the Expansion of Housing Opportunities for Renters Throughout the Region
- Continue to Improve the Capitol Region Transportation System in Order to Better Link Housing, Jobs and Services, Thus Expanding Individuals' Housing Choices

To meet these goals, CRCOG has examined a variety of strategies and has actively supported: inclusion zoning, housing mobility, property tax relief, the Hartford Homeownership Initiative, Fair Housing education, enforcement and legislation, housing rehabilitation and many others.

Hartford has an opportunity to participate, with the other 28 communities in the Capitol Region, in promoting and implementing these strategies on a region-wide basis. However, a representative of the Mayor's office does not actively participate on the CRCOG Housing Committee, nor is Hartford fully represented on the CRCOG Policy Board at this time.

<u>Impediment</u>: Hartford does not participate to the extent that it could on either the CRCOG Housing Committee or the CRCOG Policy Board.

**Recommendation:** The Mayor should appoint either an elected official or a representative of his office to the CRCOG Housing Committee. This representative should actively participate on the Committee and report to the Mayor and City Council the Committee's activities and policy recommendations. Hartford should take full advantage of the four seats that it holds on the CRCOG Policy Board and ensure that City representatives provide Hartford's perspective on the regional issues addressed and support recommendations that benefit the City and its residents.

## SUMMARY OF IMPEDIMENTS AND RECOMMENDATIONS

#### **Education and Enforcement**

<u>Impediment</u>: Based on the number of complaints received from various fair housing agencies, there is a lack of knowledge by housing consumers of Fair Housing Laws, discriminatory practices and enforcement agencies and procedures. Further, those suspecting discrimination are reluctant to report it or proceed with filing fair housing complaints.

**Recommendation:** The City's Office of Human Relations should expand the Fair Housing section of its web site to include additional links and descriptions of agencies that address fair housing. Contact information should be included with a description of fair housing services available from each. The web site could also highlight fair housing cases and publicize settlements awarded to complainants found to have been discriminated against. Such information could serve to encourage those who believe they have experienced discrimination, to take action. Examples of discriminatory actions and/or policies should also be added.

**Recommendation:** The City, through the Office of Human Relations, should work with the Housing Education Resource Center to conduct educational workshops for city landlords that focus on fair housing and housing discrimination.

**Recommendation:** Those purchasing multi-family homes through programs sponsored and funded by the City should be required to attend a landlord education program before closing on their properties.

<u>Impediment</u>: although the City of Hartford does not have a Fair Housing Ordinance, the City's Fair Housing Officer is currently developing one.

**Recommendation:** The City should make the development of a Fair Housing Ordinance a priority and ensure the Fair Housing Officer has the resources available to develop it in a timely fashion. When the proposed ordinance is complete, the City Council should review it, finalize it and adopt it as soon as possible.

<u>Impediment</u>: The City's Office of Human Relations does not track the nature of fair housing complaints or requests for information.

**Recommendation:** The Office of Human Relations should continue to develop and expand a uniform system to record the specific inquiries and complaints it receives relative to fair housing. This information should be shared with agencies within the City that address fair housing. This will help both the City and these agencies conduct outreach campaigns that address the issues of most concern to Hartford residents.

**Impediment:** The City does not have a full-time Fair Housing Officer.

**Recommendation:** The City should hire a full-time Fair Housing Officer to consistently available to address fair housing issues. That person should maintain representation and active participation in the Fair Housing Association of Connecticut.

#### **Rental Housing - Subsidized**

<u>Impediment</u>: The lack of Housing Mobility Support and Assistance services for participants of Hartford-based Section 8 Programs operated by the Hartford Housing Authority and Imagineers severely limits the ability of these households to fully explore their housing options and opportunities.

**Recommendation:** Support expansion of current mobility support and assistance services by endorsing increased program funding.

<u>Impediment</u>: Changes made by HUD in the funding and administrative policies of the Section 8 program will result in reduced mobility and fair housing choice for program participants that can lead to increased poverty and minority concentration in the City of Hartford.

**Recommendation:** The City must closely monitor the effects of changes made to the administration and funding of Section 8 and provide support for measures taken by Imagineers and the Hartford Housing Authority to ensure mobility remains an integral component of City Section 8 Programs. City officials should make sure members of Connecticut's Congressional delegation are aware of the

adverse impact changes and cuts to the Section 8 program have/will have on equal housing opportunities.

<u>Impediment</u>: Households participating in Section 8 and other subsidy programs may not be fully aware that they are protected against discrimination based on their participation in these programs.

**Recommendation:** Ensure that Imagineers and the Hartford Housing Authority continue to inform subsidy recipients of fair housing laws, discriminatory practices and enforcement procedures.

<u>Impediment</u>: There is no system for Section 8 administrators to obtain and share information about landlords who are found guilty of housing discrimination.

**Recommendation:** The City's Fair Housing Officer should convene representatives of City Section 8 administrators, CHRO, HUD and other groups that address fair housing to develop such an information sharing system and Section 8 administrators, with HUD, should determine what their course of action will be regarding the participation of these landlords in their Section 8 programs.

### Rental Housing - Unsubsidized

**Recommendation:** The effect of new, middle and upper income housing on rent levels throughout the City should be closely monitored.

**Recommendation:** According to the City's web site, the Fair Rent Commission is currently inactive. This information needs to be updated and the Fair Rent Commission should conduct outreach activities to ensure residents are aware of its purpose and operation.

#### **Ownership Housing**

<u>Impediment</u>: Limited homeownership opportunities for low-income minority impacts their ability to benefit from the financial advantages and stability of homeownership. Consequently, the homeownership rate in Hartford among minorities is low.

**Recommendation:** The City should continue to provide CDBG funds to help ensure the goals of the Mayor's Homeownership Initiative are achieved. Further, it should continue to seek additional funds from area lenders and corporations to assist in this effort.

<u>Impediment</u>: Many first-time homebuyers have little or no knowledge of fair housing laws and/or illegal discriminatory practices and/or predatory lending. A target for these illegal activities, are minorities with poor credit.

**Recommendation:** The City should continue to support Homeownership counseling and require that those purchasing through its Homeownership Initiative programs complete it prior to closing. The City should also review the curriculum used by each City-funded counseling provider and require that fair housing and predatory lending are included.

#### **Disability Issues**

<u>Impediment</u>: Disabled individuals and housing providers need to be aware of their rights and responsibilities under Fair Housing Laws and the Americans with Disabilities Act (ADA).

**Recommendation:** The City's Office of Human Relations web site includes a brief explanation of this issue and a link to "ADA Questions and Answers". However, the inclusion of specific examples of accommodations would make the subject easier to understand. Outreach material and information should be developed by the Commission on Disabilities Issues and the City's Fair Housing Officer addressing this aspect of fair housing.

#### **Lending Policies and Practices**

<u>Impediment</u>: The lack of loan reporting data from lenders makes it impossible to determine if housing loans are being made in a non-discriminatory manner geographically throughout the city and with equitable terms.

**Recommendation:** The City must enforce the loan data reporting requirement and have staff assigned to examine and analyze the data when it is submitted.

<u>Impediment</u>: Lenders to do not submit loan data information on a regular basis and some do not comply with City requests for it or do not provide it in the required format.

**Recommendation:** The OHR Fair Housing Officer has indicated he plans to meet with lender representatives to review City reporting requirements. Lenders need to be reminded that noncompliance can result in the City revoking depository qualifications. A deadline should be set for the submission of annual data.

**Impediment:** Although the loan data reporting forms require lenders to report on the number of loan applications received, approved and denied, they do not request than lenders report the reason loans were denied.

**Recommendation:** The loan data reporting forms should be revised to include a section for lenders to report why loans were denied.

<u>Impediment</u>: The City can only require the submission of loan reporting data from those lenders that are depositories of City funds. These lenders represent just a portion of those providing housing loans to City residents.

**Recommendation:** The City Fair Housing Officer should meet with additional lenders and request that they provide loan data information on a voluntary basis.

**Recommendation:** The City's Fair Housing Officer should periodically review and evaluate the CRA reports of City-based lenders to ensure they are meeting the housing credit needs of City residents.

#### **Regional Approaches**

<u>Impediment</u>: Hartford does not participate to the extent that it could on either the CRCOG Housing Committee or the CRCOG Policy Board.

<u>Recommendation</u>: The Mayor should appoint either an elected official or a representative of his office to the CRCOG Housing Committee. This representative should actively participate on the Committee and report to the Mayor and City Council the Committee's activities and policy recommendations. Hartford should take full advantage of the four seats that it holds on the CRCOG Policy Board and ensure that City representatives provide Hartford's perspective on the regional issues addressed and support recommendations that benefit the City and its residents.

**NOTE:** Various sources were used to compile the information presented here including: "Trends Shaping Our Region, A Census Data Profile of Connecticut's Capitol Region" prepared by the Capitol Region Council of Governments (CRCOG), "Achieving the Balance: A Plan of Conservation and Development for the Capitol Region", prepared by CRCOG, the U.S. Census Bureau "American FactFinder" web site, A Hartford Primer & Field Guide produced by the Cities Data Center at Trinity College, the City of Hartford's web site and previous Analysis of Impediments to Fair Housing Choice reports. A key discrepancy was immediately apparent when comparing the data provided by the different sources. The total population of Hartford in 2000 was reported as 124,121 by some sources and 121,578 by others. It was learned that this discrepancy was due to the initial counting of 2,543 people as being residents of West Hartford. An adjustment was later made that correctly added these people to the Hartford population. Most of the information presented here relative to the population uses percentages because the <u>numbers</u> would total 124,121 or 121,578, depending upon the source used.